

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

Pennsylvania Voters Alliance, Stephanie
Borowicz, Kristine Eng, Theodore A.
Dannerth, Eric Kroner, Eric Nelson, Daryl
Metcalf, Dawn Wetzel Keefer, Russ
Diamond, Chris Dush, Jim Gregory, Francis
Ryan, Michael Harvey, David Torres, Dasha
Pruett,

Court File No.

**DECLARATION OF
ERICK G. KAARDAL**

Plaintiffs,

vs.

Centre County, Delaware County, and the
City of Philadelphia,

Defendant.

I, Erick G. Kaardal, being duly sworn, declares as follows:

1. I have personal knowledge of the following.
2. I am an attorney for the Plaintiffs Pennsylvania Voters Alliance, Stephanie Borowicz, Kristine Eng, Theodore A. Dannerth, Eric Nelson, Daryl Metcalf, Dawn Wetzel Keefer, Rus Diamond, Chris Dush, Jim Gregory, Francis Ryan, Michael Harvey, David Torres, and Dasha Pruett
3. Attached as Exhibit A is a copy of the grants page from the website of the Center for Tech and Civic Life.
4. Attached as Exhibit B is a copy of a Chicago NPR story “Not Plain A’: Charities Are Stepping Up To Pay For 2020 Elections,” dated September 18, 2020.
5. Attached as Exhibit C is the August 7, 2020 grant request from the City of Philadelphia to the Center for Tech and Civic Life and the August 21, 2020 grant approval

from Center for Tech and Civic Life Executive Director Tiana Epps-Johnson for over \$10 million.

6. Attached as Exhibit D is a copy of the April 10, 2020 Pennsylvania Secretary of State certification letter to the United States Election Assistance Commission regarding a request for \$14.3 million under the CARES Act through the Help America Vote Act.

7. Attached as Exhibit E is a copy of the July 18, 2020 Narrative Report from the Pennsylvania Department of State which describes how the Department spend their CARES Act grant through the Help America Vote Act.

8. Attached as Exhibit F is a copy of a July 16, 2020 Election Assistance Commission – Election Security Grant Funding Chart indicating Pennsylvania’s \$28.6 million fiscal allocation and \$3.68 million match in 2018 and 2020.

9. Attached as Exhibit G is a copy of a July 22, 2020 Election Assistance Commission – CARES Act Funding Chart indicating Pennsylvania’s \$14.2 million allocation and \$2.8 million match.

10. Attached as Exhibit H is a copy of the Pennsylvania Department of State distribution by County of their 2020 CARES Act grant fund through the Help American Vote Act. <https://www.dos.pa.gov/VotingElections/Pages/2020-Federal-Grants.aspx>.

11. Attached as Exhibit I is a copy of a Los Angeles Times story, “When will we know if Biden or Trump won? It could depend on absentee ballot rules in these states.” Accessed 9/25/2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 25, 2020

/s/Erick G. Kaardal

Erick G. Kaardal

Hennepin County
State of Minnesota